

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SureFunding, LLC,¹

Debtor.

Chapter 11

Case No. 20-10953 (LSS)

**JOINT WITNESS LIST FOR THE MAY 12, 2020 HEARING ON THE MOTIONS OF
THE NOTEHOLDERS TO DISMISS THE DEBTOR’S CHAPTER 11 CASE AND THE
UNITED STATES TRUSTEE’S MOTION FOR AN ORDER DISMISSING OR
CONVERTING THIS CASE TO CHAPTER 7 OR DIRECTING THE APPOINTMENT
OF A TRUSTEE**

The debtor and debtor-in-possession (the “Debtor” or “SureFunding”) in the above-captioned case and the Noteholders will call the following witnesses at the May 12, 2020 hearing regarding (i) the Motion of the Noteholders to Dismiss the Debtor’s Chapter 11 Case [D.I. 15]; and (ii) the United States Trustee’s Motion for an Order Dismissing or Converting this Case to Chapter 7 or Directing the Appointment of a Trustee [D.I. 34].

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¹ The last four digits of the Debtor’s taxpayer identification number is 7898. The Debtor’s headquarters and service address is 6671 Las Vegas Blvd., Suite 210, Las Vegas, NV 89119.

Name and Title of Witness	Subject of Testimony	Location of Witness	Place Where Witness is Testifying	Anyone Else in Room?	Documents with Witness
Neal Falkenberry, Noteholder	Background information regarding Noteholder investments in SureFunding, Tradepay failures to pay and defaults, SureFunding's communications to Noteholders regarding Tradepay and investments, Organization of Noteholders following default, Noteholders' decision to seek appointment of receiver and preference for receivership over bankruptcy/Abernathys/Gavin, Amounts due to Noteholders, and rebuttal as necessary	Great Falls, VA, USA	Office	No	Hearing Exhibits
Michael Flanagan, Court Appointed Receiver for SureFunding, LLC	Nevada receivership action and information provided to receiver in connection therewith, receivership versus bankruptcy and duties of receiver	Overland Park, KS, USA	Home	No	Hearing Exhibits
Justin Abernathy, Member of Sure Funding	Background of Debtor's business; Euler Hermes and Tradepay matters; entity governance; Noteholder communications; amounts due to noteholders	Dorado, PR, USA	Home	No	Hearing Exhibits
Edward T. Gavin, CTP, Chief Restructuring and Liquidation Officer ("CRLO") of SureFunding	Debtor's bankruptcy case; entity governance; Debtor's assets and liabilities; Euler Hermes and Tradepay matters	Garnet Valley, PA, USA	Home	No	Hearing Exhibits

John T. Palmer, CTP, Independent Manager of SureFunding	Entity governance; decision to file bankruptcy; retention of CRLO	Ambler, PA, USA	Home	No	Hearing Exhibits
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Dated: May 8, 2020

FOX ROTHSCHILD LLP

/s/ Thomas M. Horan

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Proposed Counsel to the Debtor and Debtor-in-Possession